

**UNITED STATES DISTRICT COURT
DISTRICT OF MAINE**

UNITED STATES OF AMERICA)	
)	Criminal No. 1:15-po-00005-JCN
v.)	
)	
)	
DUSHKO VENELINOV VULCHEV)	

GOVERNMENT'S VERSION OF THE OFFENSE

On about February 5, 2015, in the District of Maine and elsewhere, the defendant Dushko Venelinov Vulchev knowingly and willfully did intimidate, threaten, and harass a foreign official.

Specifically, on February 5, 2015, the defendant sent an email from his home in Houlton, Maine to K.G., a Bulgarian Vice-President of the European Commission, and others at the European Commission. The European Commission is located in Brussels, Belgium. The email was written in Bulgarian and made certain demands of K.G. and her colleagues. The defendant informed K.G. that if those demands were not met he would physically harm K.G. and others at the European Commission.

If this case were to proceed to trial, the government would present certified records of the defendant's email usage and the associated internet protocol addresses. The government would also call the law enforcement personnel who interviewed Vulchev when he was arrested. During that interview, the defendant admitted sending the February 5, 2015 email. Finally, the government would call the computer forensics examiner who analyzed the defendant's computer.

The forensics examiner would provide evidence linking the defendant's computer to the February 5, 2015 email.

Respectfully submitted,

THOMAS E. DELAHANTY, II
United States Attorney

/s/ ANDREW MCCORMACK

ANDREW MCCORMACK
Assistant U.S. Attorney

Date: October 2, 2015

CERTIFICATE OF SERVICE

I hereby certify that on October 2, 2015, I electronically filed Government's Version of the Offense with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Marvin H. Glazier, Esq., at mhg@vbk.com

Thomas E. Delahanty II
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BY: **/s/ Andrew McCormack**
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